

Knittel, Janette

From: Tasya Gray <ngray@dofnw.com>
Sent: Thursday, February 18, 2021 1:28 PM
To: Knittel, Janette
Subject: RE: Draft Schedule for pre-CMS data collection

Categories: Print or Save, FOIA, Rhone-Poulenc

Okay it was just a snapshot of the PQL vs. MDL for PCBs via 8082 run by ARI, our project lab. The MDL is down around 0.002 ug/L for Aroclors.

From: Knittel, Janette <Knittel.Janette@epa.gov>
Sent: Thursday, February 18, 2021 12:56 PM
To: ngray@dofnw.com
Subject: RE: Draft Schedule for pre-CMS data collection

Yes, I did get your email about the schedule, thank you. However, the image in your email below didn't make it...

From: Tasya Gray <ngray@dofnw.com>
Sent: Thursday, February 18, 2021 11:45 AM
To: Knittel, Janette <Knittel.Janette@epa.gov>
Subject: RE: Draft Schedule for pre-CMS data collection

Hi Janette,

Did my other email come through to you with the revised schedule notes?

Also- from the lab on PCBs (and on PCP) reporting limits and MDL. Reporting down to the MDL looks like it would get us one more order of magnitude down.



Regards,
Tasya

From: Knittel, Janette <Knittel.Janette@epa.gov>
Sent: Thursday, February 18, 2021 11:17 AM
To: ngray@dofnw.com
Subject: RE: Draft Schedule for pre-CMS data collection

Hi Tasya. I didn't take notes on the schedule revisions you made during our call. Can you send that to me today please?
Thanks.
Janette

From: Knittel, Janette
Sent: Tuesday, February 16, 2021 4:37 PM
To: Tasya Gray <ngray@dofnw.com>
Subject: RE: Draft Schedule for pre-CMS data collection

Hi Tasya. Thank you for putting together this schedule. I see a couple of items that I think need to be tweaked:

- I don't see time in there for you make edits on the draft plan as a result of EPA's review, then for EPA to review the final plan after you make edits. I know that by having a technical meeting we'll reduce the number of comments, but we still will have comments and we will have to see the final plan to approve it. The one-week turnaround from EPA I promised was meant for reviewing the draft plan, and I will have to get buy-in from the other reviewers on that time, but I'm hoping they will be amenable.
- Please account for EPA to review the QAPP too. I'm assuming it's a standalone document and not within the Plan because you mentioned it would be used for future sampling too.

One idea is to move up the technical meeting to account for the first item and allow more time for reviews and edits. Another idea, I propose that we have two technical meetings, an early one (as soon as possible) for you to present general, preliminary ideas so you can get EPA feedback as you are developing the plan, and a second for you to share details before you submit the draft plan.

Regarding your request to push back the quarterly event from March to April – EPA approves your request.

Regards,
Janette

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From: Tasya Gray <ngray@dofnw.com>
Sent: Monday, February 15, 2021 4:51 PM
To: Knittel, Janette <Knittel.Janette@epa.gov>
Subject: Draft Schedule for pre-CMS data collection

Hi Janette,
As we discussed last week, here is a draft approximate schedule we are looking at for pre-CMS data collection at the Former Rhone Poulenc Site. Please let me know if this seems feasible for you and we can take it from there.

2021 Groundwater Sampling Schedule pre-CMS Data Gaps

Feb 22 – Letter from EPA requesting Work Plan (we plan to work on the work plan in the background based on the draft outline shared, so getting this letter a bit later than the 22nd should still be ok)

Mar 22 - Tech Meeting with EPA to Review Work Plan Detail

- Review maps and tables, discuss scope of investigation
- Review approach to inspection/developing wells
- Resolve schedule for reporting

Mar 29 - Submit Work Plan to EPA

Apr 5 - EPA Approval of Work Plan

Apr 7/12 – Well inspections and redevelopment (if we are agreed on approach at the tech meeting for this, may be able to do this preliminary step earlier since well maintenance is a general task anticipated as part of the performance monitoring program)

Apr 19/26 – Latest start to First Quarter Sampling/ Baseline Sampling

May or earlier – Pumping system shutdown and intensive monitoring period commences to coincide with anticipated spring river stage change

With this schedule in mind, we request that the first quarter sampling, typically conducted in March, be allowed to occur in April 2021 instead to allow it to be implemented in conjunction with additional groundwater well sampling that will be proposed as part of the this pre-CMS Data Gaps Work Plan. This will allow a little more time to complete the work plan and review details of it with EPA, while letting the work be completed efficiently and avoiding sampling the same wells a couple weeks apart simply to collect different sample containers (for different analyses).

Thank you,
Tasya

Tasya Gray, LG

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